## IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

Mofet Etzion Ltd.,

Plaintiff,

v.

Civil Action No.: 07-CIV-4566 (LAP)

General Dynamics Land Systems, Inc.,

Defendant.

## **DEFENDANT'S MOTION TO CONFIRM ARBITRATION AWARD**

Defendant General Dynamics Land Systems, Inc. ("GDLS") hereby moves this Court pursuant to 9 U.S.C. § 9 to confirm the arbitration award (the "Award") entered in favor of GDLS in International Centre for Dispute Resolution, Commercial Arbitration Tribunal, Case Number 50 180 T 00373, because there are no grounds to vacate the Award, as fully explained by GDLS in Defendant's Memorandum in Opposition to Plaintiff's Petition to Vacate Arbitration Award and in Support of Defendant's Motion to Confirm Arbitration Award, which is submitted herewith.

WHEREFORE, GDLS requests that this Court:

- a. deny Plaintiff's Petition to Vacate Arbitration Award;
- b. grant Defendant's Motion to Confirm Arbitration Award;
- c. award GDLS its costs and legal fees incurred in this action; and
- d. grant GDLS all other relief that this Court deems just and appropriate.

Dated: July 20, 2007 Respectfully submitted,

GENERAL DYNAMICS LAND SYSTEMS,

INC.

By:

One of its Attorneys

Susan C. Levy Richard T. Franch Richard C. Stiffler JENNER & BLOCK LLP 330 N. Wabash Ave. Chicago, Illinois 60611 (312) 222-9350

Susan J. Kohlmann JENNER & BLOCK LLP 919 Third Avenue, 37th Floor New York, New York 10022 (212) 891-1690 skohlman@jenner.com

## **CERTIFICATE OF SERVICE**

I, Susan J. Kohlmann, an attorney, hereby certify that on July 24, 2007 I caused true and correct copies of the *Defendant's Motion to Confirm Arbitration Award* to be served on attorneys for Plaintiff via e-mail.

s/ Susan J. Kohlmann	